



THE CITY OF NEW YORK  
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December 14, 2023

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149  
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing the appearing defendants in the above referenced matter. I write with the consent of plaintiffs' counsel to respectfully request that defendants be permitted to exceed the 25 page limit in its Memorandum of Law in support of their motion to dismiss, which is presently due on December 22, 2023. Defendants respectfully request permission to submit a 35 page Memorandum of Law. The reason for the request is the multitude of claims and parties named in plaintiffs' Class Third Amended Complaint, all of which will have to be addressed in defendants' motion. Defendants consent to plaintiffs receiving permission to also submit a 35 page Memorandum of Law in opposition to defendants' motion to dismiss.

This is the first such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)

